

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Intelsat License LLC

Application for Authority to Launch and Operate Intelsat 22, a Replacement Satellite With New Frequencies, at 72.1° E.L.

File No. SAT-RPL- _____

**APPLICATION FOR AUTHORITY TO LAUNCH AND OPERATE
INTELSAT 22, A REPLACEMENT SATELLITE WITH NEW FREQUENCIES,
AT 72.1° E.L.**

Intelsat License LLC (“Intelsat”), pursuant to Section 25.114 of the Federal Communications Commission’s (“FCC” or “Commission”) rules,¹ hereby applies to launch and operate a replacement C/Ku-band satellite, to be known as Intelsat 22, at the 72.1° E.L. orbital location. Intelsat 22 also will carry a UHF payload that will operate in non-commercial frequencies, which will be owned and operated by the Australian Defence Force and will be licensed by the Administration of Australia. Intelsat 22 is scheduled for launch on a Proton vehicle in the first quarter of 2012 and will replace the Intelsat 709 satellite (call sign S2396), which is currently operating at 72.1° E.L.,² and Intelsat 706 (call sign S2401), which is currently operating at 72.0° E.L.³ Intelsat 22 will operate on a non-common carrier basis.⁴

¹ 47 C.F.R. § 25.114.

² See *Policy Branch Information; Actions Taken*, Report No. SAT-00796, File No. SAT-MOD-20110428-00081 (July 29, 2011) (Public Notice).

³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00802, File No. SAT-STA-20110810-00159 (Aug. 19, 2011) (Public Notice); see also Intelsat License LLC, Request for Extension of Special Temporary Authority to Drift and Operate Intelsat 706, File No. SAT-STA-

As demonstrated below, Intelsat is legally and technically qualified to launch and operate its proposed replacement satellite. Moreover, grant of this application will serve the public interest by ensuring continuity of service to customers at the 72.1° E.L. orbital location. In accordance with the Commission's requirements,⁵ this application has been filed electronically as an attachment to FCC Form 312 and Schedule S.

I. INTELSAT IS QUALIFIED TO HOLD THE REPLACEMENT AUTHORIZATION REQUESTED HEREIN

A. Legal Qualifications

Intelsat is legally qualified to hold the replacement space station authorization requested in this application. The information provided in the attached Form 312 demonstrates Intelsat's compliance with the Commission's basic legal qualifications. In addition, Intelsat already holds multiple Commission satellite licenses, and its "legal qualifications are a matter of record" before the Commission.⁶

20110912-00177 (filed Sept. 12, 2011). As noted in the recently filed STA extension request, Intelsat 706 is expected to remain at 72.0° E.L. only for two or three more months, after which it will be redeployed to a new location.

⁴ Section 310(b) is not applicable to this license because Intelsat 22, like all other satellites licensed to Intelsat, will operate on a non-common carrier basis. *See Applications of The News Corp. Ltd. and The DIRECTV Group, Inc. (Transferors) and Constellation, LLC, Carlyle PanAmSat I, LLC, Carlyle PanAmSat II, LLC, PEP PAS, LLC and PEOP PAS, LLC (Transferees) for Authority to Transfer Control of PanAmSat Licensee Corp.*, Public Notice, 19 FCC Rcd 15,424, 15,425 (note 5) (Int'l Bur. 2004).

⁵ 47 C.F.R. § 25.114(c).

⁶ *See Constellation, LLC, Carlyle PanAmSat I, LLC, Carlyle PanAmSat II, LLC, PEP PAS, LLC, and PEOP PAS, LLC, Transferors and Intelsat Holdings, Ltd., Transferee, Consolidated Application for Authority to Transfer Control of PanAmSat Licensee Corp. and PanAmSat H-2 Licensee Corp.*, Memorandum Opinion and Order, 21 FCC Rcd 7368, 7381(¶ 23) (2006) ("The Commission previously has determined that PanAmSat and Intelsat are qualified to hold licenses.").

B. Technical Qualifications

In the attached Form 312, Schedule S, and Engineering Statement, Intelsat demonstrates that it is technically qualified to hold the authorization requested herein. Specifically, Intelsat provides the information currently required by Section 25.114 of the Commission's rules. In addition, the Engineering Statement provides information on Intelsat's compliance with the Commission's orbital debris mitigation rules.⁷

C. Waiver Requests

Intelsat requests waiver of the following technical rules:

- (1) Section 25.210(i)(1), which specifies cross polarization isolation requirements within the primary coverage area; and
- (2) Section 25.211(a), which specifies requirements for downlink analog video transmissions in C-band.

Under Section 1.3 of the Commission's rules, the Commission has authority to waive its rules "for good cause shown."⁸ Good cause exists if "special circumstances warrant a deviation from the general rule and such deviation will serve the public interest" better than adherence to the general rule.⁹ In determining whether waiver is appropriate, the Commission should "take into account considerations of hardship, equity, or more effective implementation of overall policy."¹⁰ As shown below, there is good cause for each of the requested technical waivers.

1. Request for Waiver of Section 25.210(i)(1)

Intelsat requests waiver of Section 25.210(i)(1) of the Commission's rules. Section 25.210(i)(1) requires that satellites be designed to provide a cross-polarization isolation such that

⁷ *Mitigation of Orbital Debris*, Second Report and Order, 19 FCC Rcd 11,567 (2004).

⁸ 47 C.F.R. § 1.3; *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969).

⁹ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

¹⁰ *WAIT Radio*, 418 F.2d at 1159.

the ratio of the on-axis co-polar gain to the on-axis cross-polar gain of the antenna in the assigned frequency band will be at least 30 dB within its primary coverage area. As explained more fully on pages 6 and 7 and Exhibits 5D-1 through 5D-13 of the attached Engineering Statement, the 30 dB requirement is not met within a limited portion of the coverage areas of a number of Intelsat 22's receive and transmit beams.

Good cause exists to waive the cross-polarization isolation requirement of Section 25.210(i)(1) because a failure to meet the requirement does not adversely affect any other operator.¹¹ The FCC previously has acknowledged that non-compliance results only in self-interference and granted waivers to other operators in similar situations.¹² In this case, the minimum level of isolation of the non-compliant Intelsat 22 beams is equal to or greater than 24 dB. This level was the best that the satellite manufacturer could achieve without causing excessive degradation in the co-polarized gain of the beam and/or in the size of its coverage area. Intelsat has taken this level of isolation into account in its planned operations. Accordingly, Commission precedent supports a grant of Intelsat's requested waiver of Section 25.210(i)(1) for Intelsat 22.¹³

¹¹ See *AMC-15 Ku-Band Circular Polarization Amendment*, File No. SAT-AMD-20030422-00069, Attachment Terms and Conditions of Authorization (¶ 5) (Aug. 18, 2004).

¹² See, e.g., *Applications of INTELSAT LLC; For Authority to Operate, and to Further Construct, Launch, and Operate C-band and Ku-band Satellites that Form a Global Communications System in Geostationary Orbit*, 15 FCC Rcd 15,460, 15,503 (¶ 109) (2000); *New Skies Satellites N.V.; Petition for Declaratory Ruling*, Order, 17 FCC Rcd 10,369, 10,376-377 (¶ 19) (2002); *Star One S.A. Petition for Declaratory Ruling to Add the Star One C1 Satellite at 65° W.L. to the Permitted Space Station List*, Order, 19 FCC Rcd 16,334, 16,339 (¶ 12) (2004).

¹³ See *Application to Launch and Operate Intelsat 17, a Replacement Satellite, at 66.0 E.L.*, IBFS File No. SAT-LOA-20100726-00167 (stamp grant Nov. 17, 2010; re-issued stamp grant with further conditions Dec. 17, 2010).

2. Request for Waiver of Section 25.211(a)

Intelsat also requests waiver of Section 25.211(a), which requires that the downlink analog video transmissions in the band 3700-4200 MHz be transmitted only on a center frequency of $3700+20N$ MHz, where $N=1$ to 24. Intelsat requests that within the 3700-4200 MHz band, it be authorized to place its analog video carriers at those center frequencies that it has coordinated with operators of adjacent co-frequency satellites, rather than those specified in Section 25.211(a).

Good cause also exists for grant of this waiver request. Because Intelsat already has successfully coordinated its transmission of analog video carriers from the nominal 72.0° E.L. orbital location with operators of adjacent, co-frequency satellites, there is no risk of harmful interference. Furthermore, the Commission has previously granted Intelsat a waiver of Section 25.211(a) of the rules to operate the Intelsat 709 satellite at the nominal 72.0° E.L. orbital location.¹⁴ Grant in this case for a replacement satellite at the same nominal orbital location would be consistent with that precedent.

D. Operational Frequencies

The following chart shows the FSS frequencies that will be used by the Intelsat 22 satellite at 72.1° E.L., the FSS frequencies that are currently used by the Intelsat 709 satellite at 72.1° E.L., the Intelsat 706 satellite at 72.0° E.L., and the FSS frequencies that were used by the Intelsat 4 satellite (Call Sign S2461) at the nominal 72.0° E.L. orbital location prior to its emergency de-orbit in January 2010.

¹⁴ See *supra* note 2.

Frequency Band (MHz)	Intelsat 4	Intelsat 706	Intelsat 709	Intelsat 22
5850 – 5925				✓
5925 – 6425	✓	✓	✓	✓
3625 – 3700				✓
3700 – 4200	✓	✓	✓	✓
14000 – 14250	✓	✓	✓	✓
14250 – 14500	✓	✓	✓	✓
10950 – 11200		✓	✓	
11450 – 11700	✓	✓	✓	✓
11700 – 11950		✓see Note	✓see Note	
12250 – 12500	✓			✓
12500 – 12750	✓	✓	✓	✓

Note: Although Intelsat 706 and Intelsat 709 have the capability to operate on the 11700 – 11950 MHz, this frequency band is not utilized from the nominal 72.0° E.L. orbital location.

All of the existing frequencies on Intelsat 709 and Intelsat 706 except for the 10950-11200 MHz and 11700-11950 MHz band are also on Intelsat 22. In addition, Intelsat 22 contains new frequencies at 3625-3700 MHz and 5850-5925 MHz that are not on the Intelsat 4, Intelsat 706, or Intelsat 709 satellites. Intelsat 22 also contains the non-commercial UHF frequencies 292.835-317.33 MHz and 243.52-268.16 MHz, which will be owned and operated by the Australian Defence Force and will be licensed by the Administration of Australia.

E. Milestone Demonstration and Request for Bond Reduction

Intelsat 22 will be subject to the milestone and bond posting requirements set forth in Sections 25.164 and 25.165 of the Commission’s rules because the 3625-3700 MHz and 5850-5925 MHz frequency bands are on Intelsat 22 but are not on the Intelsat 4, Intelsat 706, or Intelsat 709 satellites.¹⁵

¹⁵ 47 C.F.R. §§ 25.164 and 25.165.

In accordance with Section 25.164(c)-(e) of the Commission's rules,¹⁶ Intelsat is providing with this application the following documentation to demonstrate that it has met the first three milestones required of a geostationary satellite:

(1) a confidential copy of its construction contract (along with a request for confidential treatment under Section 0.457 and 0.459 of the FCC's rules¹⁷);

(2) a signed statement from Michael Neuman, IS-22 Program Director, Boeing Satellite Systems, attesting to completion of Critical Design Review and attesting that physical construction of the satellite has commenced.

(3) a signed statement from Jean-Luc Froeliger, Senior Director, Space Systems Acquisition, of Intelsat that as of September 10th, 2011, Intelsat has paid the payments identified for months 1 through 29 in the Intelsat-22 Payment Schedule, which is Exhibit E1 to the confidential Fixed Price Contract for the Intelsat 4-pack Satellite Program Between Boeing Satellite Systems and Intelsat LLC dated July 10th, 2009; and

(4) photographs evidencing that physical construction of the satellite has commenced.

The Commission allows GSO licensees to reduce their bond amounts by 25 percent each time they meet a satellite milestone.¹⁸ Accordingly, Intelsat requests that the Commission determine that the first three milestones for Intelsat 22 have been satisfied and reduce the \$3,000,000 bond amount by 75 percent to \$750,000.

¹⁶ 47 C.F.R. § 25.164(c)-(e).

¹⁷ 47 C.F.R. §§ 0.457 and 0.459.

¹⁸ 47 C.F.R. § 25.165(d); *Amendment of the Commission's Space Station Licensing Rules and Policies*, First Report and Order and Further Notice of Proposed Rulemaking, 18 FCC Rcd 10760, ¶ 172 (2003); *Amendment of the Commission's Space Station Licensing Rules and Policies*, First Order on Reconsideration and Fifth Report and Order, 19 FCC Rcd 12637, ¶ 48 (2004) (reducing GSO bond requirement to \$3 million but noting that "GSO licensees will continue to be allowed to reduce their bond amount by 25 percent each time they meet a milestone."); *Star One S.A., Petition for Declaratory Ruling to Add the Star One CI Satellite a 65° W.L. to the Permitted Space Station List*, 19 FCC Rcd 16334, ¶ 15 (Int'l Bur. 2004) ("Licensees may reduce the amount of the bond upon meeting each milestone.").

II. GRANT OF THIS APPLICATION WILL SERVE THE PUBLIC INTEREST

The Commission recognizes a “replacement expectancy” in orbital locations in order to protect the large investments made by satellite operators. The agency has stated,

[G]iven the huge costs of building and operating satellite space stations, there should be some assurance that operators will be able to continue to serve their customers. The Commission has therefore stated that, when the orbit location remains available for a U.S. satellite with the technical characteristics of the proposed replacement satellite, it will generally authorize the replacement satellite at the same location.¹⁹

In this case, Intelsat holds a replacement expectancy for the nominal 72.0° E.L. orbital location. Intelsat 4 operated at this location until January 31, 2010, when the satellite was forced to de-orbit due to a technical anomaly.²⁰ Intelsat timely filed a petition for specific authority under Section 25.161(c) of the Commission’s rules to vacate the nominal 72.0° E.L. orbital location for more than 90 days.²¹ The Intelsat 706 satellite was relocated to 72.1° E.L. in July 2010,²² and the Intelsat 709 satellite was relocated to 72.1° E.L. in May 2011.²³ As

¹⁹ *Columbia Communications Corporation Authorization to Launch and Operate a Geostationary C-band Replacement Satellite in the Fixed-Satellite Service at 37.5° W.L.*, Memorandum Opinion and Order, 16 FCC Rcd 20176, ¶ 7 (2001) (citing *Assignment of Orbital Locations to Space Stations in Domestic Fixed-Satellite Service*, Memorandum Opinion and Order, 3 FCC Rcd 6972, n.31 (1988) and *GE American Communications, Inc.*, Order and Authorization, 10 FCC Rcd 13775, ¶ 6 (Int’l Bur. 1995)).

²⁰ See *Policy Branch Information; Actions Taken*, Report No. SAT-00674, File Nos. SAT-STA-20100205-00022, SAT-STA-20100212-00026 and SAT-STA-20100224-00035 (Mar. 19, 2010) (Public Notice).

²¹ See *Policy Branch Information; Satellite Space Applications Accepted for Filing*, Report No. SAT-00699, File No. SAT-MSA-20100405-00117 (Jun. 18, 2010) (Public Notice).

²² See *Policy Branch Information; Actions Taken*, Report No. SAT-00718, File No. SAT-STA-20100326-00057 (Sept. 3, 2010) (Public Notice). As noted above, Intelsat 706 currently is operating at 72.0° E.L. pursuant to STA. See *supra* note 3.

²³ See *Policy Branch Information; Actions Taken*, Report No. SAT-00782, File No. SAT-STA-20110512-00089 (May 27, 2011) (Public Notice) and *Policy Branch Information; Actions Taken*, Report No. SAT-00787, File No. SAT-STA-20110316-00055 (June 17, 2011) (Public Notice). In the grants of authority for both the Intelsat 706 satellite and the Intelsat 709 satellite, the

demonstrated in the attached Engineering Statement and FCC Form 312, Schedule S, Intelsat 22 is technically consistent with prior Intelsat satellites operating at the nominal 72.0° E.L. orbital location, taking into account that operation in the bands 3625-3700 MHz and 5850-5925 MHz will rely on filings still to be submitted to the ITU.²⁴

In addition, grant of this application will serve the public interest by ensuring continuity of service to customers from the nominal 72.0° E.L. orbital location. Intelsat stands ready to deploy a replacement satellite to the 72.1° E.L. orbital location before Intelsat 709 reaches the end of its useful life or is relocated, and, as noted above, has made concrete steps toward constructing Intelsat 22.

The Commission has stated that granting replacement applications ensures that service will be provided to consumers as efficiently as possible because the current licensee will be familiar with the service requirements and, given its experience, should be able to deploy a replacement satellite in the shortest possible time.²⁵ Moreover, Intelsat 22 will also offer

International Bureau noted that the grant was “without prejudice (1) to any decision with respect to any replacement expectancy at the 72.1° E.L. orbital location, or (2) any action on the Petition for Specific Authority Under Section 25.161(c) filed by PanAmSat Licensee Corp. on April 5, 2010, to retain authority to use C- and Ku-band frequencies at the nominal 72.0° E.L. orbital location (IBFS File No. SAT-MS-C-20100405-00117).” *See, e.g.*, Modification to Relocate Intelsat 706 to 72.1 E.L. (Call Sign S2401), File No. SAT-MOD-20100511-00098, Condition 12 (stamp grant with conditions, as corrected, Apr. 8, 2011); Request for Authority to Drift and Operate Intelsat 709 at 72.10 E.L. (Call Sign S2396), File No. SAT-STA-20110512-00089, Condition 6 (stamp grant with conditions, May 24, 2011).

²⁴ *Amendment of the Commission’s Space Station Licensing Rules and Policies*, 18 FCC Rcd 10760, ¶ 257 (2003) (“We do not require replacement satellites to be technically ‘identical’ to the existing satellite. We recognize that next-generation satellites will incorporate satellites with technical advancements made since the previous generation satellite was launched. We do not intend to change this policy, which facilitates state-of-the-art systems. Rather, we will continue to assess only whether operations of the replacement satellite will be consistent with our international coordination obligations pursuant to regulations promulgated by the International Telecommunication Union.”) (internal citations omitted).

²⁵ *See Flexibility for Delivery of Communications by Mobile Satellite Service Providers in the 2 GHz Band, the L-Band, and the 1.6/2.4 GHz Bands*, 18 FCC Rcd 1962, ¶ 83 (2003) (“Repairing

expanded capacity to customers at the 72.1° E.L. orbital location. This expansion of capacity also serves the public interest.

III. ITU COST RECOVERY

Intelsat is aware that processing fees are currently charged by the ITU for satellite filings, and that Commission applicants are responsible for any and all fees charged by the ITU.²⁶

Intelsat is aware of and unconditionally accepts this requirement and responsibility to pay any ITU cost recovery fees associated with the ITU filings that the Commission makes on behalf of Intelsat for the satellite proposed in this Application, as well as any ITU filings associated with any satellite system for which Intelsat may request authorization at a later date.

IV. 11450-11700 MHZ, 12500-12750 MHZ, 3600-3650 MHZ, 3650-3700 MHZ, AND 5850-5925 MHZ FREQUENCY BANDS

Intelsat understands that operations in the 11450-11700 MHz, 12500-12750 MHz, 3600-3650 MHz, 3650-3700 MHz, and 5850-5925 MHz frequency bands are subject to certain limitations and obligations, which Intelsat accepts and will fulfill. Specifically, for operations in the 11450-11700 MHz frequency band, Intelsat accepts the following conditions:

- Intelsat's use of the 11450-11700 MHz band (Earth-to-space) is subject to footnote US211 to the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US211, which urges applicants for airborne or space station assignments to take all practicable steps to protect radio astronomy observations in the adjacent bands from harmful interference, consistent with footnote US74.
- The operation of the Intelsat 22 space station in the 11450-11700 MHz band (Earth-to-space) is limited to international operations in accordance with footnote NG 104 to the

or even replacing a malfunctioning satellite, for all its complexity, requires less time than designing and constructing a new system. Even in the worst case where a satellite is destroyed, a licensee can ordinarily replace a lost satellite with a ground spare at the next available launch window, or procure a technically identical satellite in an expedient manner since it would have already completed the complex design process.”).

²⁶ See *Implementation of ITU Cost Recovery Charges for Satellite Network Filings*, Public Notice, DA 01-2435 (Oct. 19, 2001).

United States Table of Frequency Allocations, 47 C.F.R. § 2.106, NG 104, and footnote 2 of Section 25.202(a)(1) of the Commission's rules, 47 C.F.R. § 25.202(a)(1).

In the 12500-12750 MHz frequency band, Intelsat accepts the following condition:

- Use of the 12.5-12.75 GHz frequency band is not permitted for fixed-satellite service in the space-to-Earth direction in Region 2.

In the 3600-3650 MHz frequency band, Intelsat accepts the following condition:

- Intelsat's use of the 3600-3650 MHz (space-to-Earth) band is subject to footnote US245 of the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US245, which states that the 3600-3650 MHz use of the non-Federal fixed-satellite service is limited to international inter-continental systems and is subject to case-by-case electromagnetic compatibility analysis.

In the 3650-3700 MHz frequency band, Intelsat accepts the following condition:

- Intelsat's use of the 3650-3700 MHz (space-to-Earth) band is subject to footnote NG185 of the United States Table of Frequency Allocations, 47 C.F.R. § 2.106 NG185, which states that the 3650-3700 MHz use of the non-Federal fixed-satellite service is limited to international inter-continental systems.

In the 5850-5925 MHz frequency band, Intelsat accepts the following condition:

- Intelsat's use of the 5850-5925 MHz band (Earth-to-space) is subject to footnote US245 of the United States Table of Frequency Allocations, 47 C.F.R. § 2.106, US245, which states that the 5850-5925 MHz use of the non-Federal fixed-satellite service is limited to international inter-continental systems and is subject to case-by-case electromagnetic compatibility analysis. Intelsat shall not claim protection from radiolocation transmitting stations operating in accordance with footnote G2.²⁷

²⁷ For technical information of these radiolocation systems, see NTIA Report 83-115, Spectrum Resource Assessment in the 5650-5925 MHz Band, and NTIA Report 00-373, Measured Occupancy of 5850-5925 MHz and Adjacent 5-GHz Spectrum in the United States at <http://www.its.bldrdoc.gov/pub/pubs.php>.

V. **CONCLUSION**

Based on the foregoing, Intelsat respectfully requests that the Commission grant this replacement satellite application.

Respectfully submitted,

/s/ Susan H. Crandall

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September 29, 2011

Exhibit A
FCC Form 312, Response to Question 34: Foreign Ownership

The Commission previously approved foreign ownership in Intelsat License LLC (“Intelsat”), in the *Intelsat-Serafina Order*.²⁸ In December 2009, the Commission also approved the *pro forma* changes in Intelsat’s foreign ownership.²⁹ There have been no other material changes to Intelsat’s foreign ownership since the date of the *Intelsat-Serafina Order*.

²⁸ *Intelsat Holdings, Ltd. and Serafina Holdings Limited, Consolidated Application for Consent to Transfer of Control of Holders of Title II and Title III Authorizations, Memorandum Opinion and Order, 22 FCC Rcd 22,151 (2007).*

²⁹ *See Intelsat North America LLC, Intelsat LLC, PanAmSat Licensee Corp., PanAmSat H-2 Licensee Corp., and Intelsat New Dawn Company, Ltd., Applications for Pro Forma Transfer of Control, File Nos. SAT-T/C-20091125-00128, SAT-T/C-20091125-00124, SAT-T/C-20091125-00127, SAT-T/C-20091125-00125, SAT-T/C-20091125-00126, SES-T/C-20091125-01505, SES-T/C-20091125-01502, SES-T/C-20091125-01506, SES-T/C-20091125-01504 and SES-T/C-20091125-01503 (granted Dec. 3, 2009).*

Exhibit B
FCC Form 312, Response to Question 36: Cancelled Authorizations

Intelsat License LLC (“Intelsat”) has never had an FCC license “revoked.” However, on June 26, 2000, the International Bureau “cancelled” two Ka-band satellite authorizations issued to a former Intelsat entity, PanAmSat Licensee Corp. (“PanAmSat”),³⁰ based on the Bureau’s finding that PanAmSat had not satisfied applicable construction milestones.³¹ In that same order, the Bureau denied related applications to modify the cancelled authorizations. PanAmSat filed an application for review of the Bureau’s decision, which the Commission denied, and subsequently filed an appeal with the United States Court of Appeals for the District of Columbia Circuit, which was dismissed in January 2003 at PanAmSat’s request. Notwithstanding the fact that the Bureau’s action does not seem to be the kind of revocation action contemplated by question 36, Intelsat is herein making note of the decision in the interest of absolute candor and out of an abundance of caution. In any event, the Bureau’s action with respect to PanAmSat does not reflect on Intelsat’s basic qualifications, which are well-established and a matter of public record.

³⁰ All licenses previously held by PanAmSat Licensee Corp. have been assigned to Intelsat License LLC. See IBFS File Nos. SAT-ASG-20101203-00252 (granted Dec. 23, 2010), SES-ASG-20101203-0150 (granted Dec. 20, 2010), and SES-ASG-20101206-01502 (granted Dec. 20, 2010).

³¹ See *PanAmSat Licensee Corp.*, Memorandum Opinion and Order, 15 FCC Rcd 18720 (IB 2000).

Exhibit C
FCC Form 312, Response to Question 40:
Officers, Directors, and Ten Percent or Greater Shareholders

The officers and directors/managers of Intelsat License LLC are as follows:

Officers:

Michael McDonnell, Chairman
Flavien Bachabi, Deputy Chairman
Phillip Spector, Secretary
Simon Van De Weg, Director, Finance

Board of Managers:

Michael McDonnell
Flavien Bachabi
Phillip Spector

The address of all Intelsat License LLC officers and members of the Board of Managers is:

4 rue Albert Borschette
L-1246 Luxembourg

Intelsat License LLC is a Delaware limited liability company that is wholly owned by Intelsat License Holdings LLC, also a Delaware limited liability company. Intelsat License Holdings LLC is wholly owned by Intelsat Subsidiary Holding Company S.A., a Luxembourg company. Intelsat Subsidiary Holding Company S.A. is wholly owned by Intelsat Phoenix Holdings S.A., a Luxembourg company. Intelsat Phoenix Holdings S.A. is wholly owned by Intelsat Intermediate Holding Company S.A., a Luxembourg company. Intelsat Intermediate Holding Company S.A. is wholly owned by Intelsat Jackson Holdings S.A., a Luxembourg company. Intelsat Jackson Holdings S.A. is wholly owned by Intelsat (Luxembourg) S.A., a Luxembourg company. Intelsat (Luxembourg) S.A. is wholly owned by Intelsat S.A., a Luxembourg company. Intelsat S.A. is wholly owned by Intelsat Holdings S.A., a Luxembourg company. Intelsat Holdings S.A. is wholly owned by Intelsat Global Subsidiary S.A., a Luxembourg company. Intelsat Global Subsidiary S.A. is wholly owned by Intelsat Global S.A., a Luxembourg company (“Intelsat Global”, formerly “Serafina Holdings Limited”). Each of these entities may be contacted at the following address: 4 rue Albert Borschette, L-1246 Luxembourg.

Intelsat Global’s ownership was approved by the Commission in the *Intelsat-Serafina Order*, has not changed materially and is incorporated by reference. See *Intelsat Holdings, Ltd. and Serafina Holdings Limited, Consolidated Application for Consent to Transfer of Control of Holders of Title II and Title III Authorizations*, Memorandum Opinion and Order, 22 FCC Rcd 22,151 (2007) (“*Intelsat-Serafina Order*”).